

UNITED STATES DISTRICT COURT

for the
Western District of Washington

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In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Records and information associated with five GRINDR LLC
ACCOUNTS email accounts, which are further described in
Attachment A.

Case No. 3:23-mj-05158

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A, incorporated herein by reference.

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. 2243

Sexual Abuse of a Minor

The application is based on these facts:

- ☒ See Affidavit of SA Susannah Lustig, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

SUSANNAH LUSTIG

Digitally signed by SUSANNAH LUSTIG
Date: 2023.04.20 11:24:32 -07'00'

Applicant's signature

Susannah R. Lustig, Special Agent, National Park Service

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 04/21/2023

Theresa L. Fricke
Judge's signature

City and state: Tacoma, Washington

Theresa L. Fricke, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF WASHINGTON

ss

COUNTY OF PIERCE

I, Susannah R. Lustig, being first duly sworn under oath, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Investigative Services Branch of the National Park Service. I have been stationed in the Pacific Field Office since January 2017. Prior to this position I was a uniformed U.S. Park Ranger with the National Park Service for seventeen years. I am a graduate of the Land Management Basic Law Enforcement Program and Criminal Investigator Training Program at the Federal Law Enforcement Training Center at Glynco, GA. I have previously investigated cases of Sexual Abuse of a Minor. Part of my responsibilities as a Special Agent include investigations involving crimes against children in National Parks.

2. As a Special Agent, I have led and/or participated in investigations of a wide array of federal criminal violations including assaults, domestic violence, crimes against children, firearms violations, fraud, robberies, and homicide. During these investigations, I have participated in the execution of search warrants and the seizure of evidence of criminal activity. My training has included courses in law enforcement techniques, federal criminal statutes, conducting complex criminal investigations, physical and electronic surveillance techniques, evidence collection techniques and the execution of search warrants. I am an investigative law enforcement officer of the United States within the meaning of Title 18, United States Code, Section, 2510(7), and empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2243. I am classified and trained as a Federal Law Enforcement Officer with federal statutory arrest authority.

3. The National Park Service is investigating 34-year-old BRICESON R. STANDLEY, a resident of Port Angeles, Washington, for the sexual assault of a minor, MV. On two occasions in the spring of 2022, STANDLEY met with then fifteen-year-old MV and sexually assaulted him in Olympic National Park. Before meeting in person MV and STANDLEY connected using the “Grindr” social media app

4. The evidence gathered in this investigation shows that STANDLEY primarily used two technology platforms to contact MV: Discord and Grindr.

5. Grindr is a location-based social networking application primarily used by gay men with millions of users. Individual users create their own profiles; however, users are not required to have a name or an individually selected picture shown with their profile. The platform shows other nearby users in order of ascending geographical distance. Users can message each other directly on the platform.

6. I make this Affidavit in support of an application for a warrant to search for information associated with the following **TARGET GRINDR ACCOUNTS**:

Grindr accounts associated with emails:

bricesonrs@gmail.com

bricesonstandley@gmail.com

briceson_standley_1988@yahoo.com

briceson_standley_1988@hotmail.com

brice.standley.88@gmail.com

that is stored at premises controlled by Grindr LLC., an electronic communications and remote computer services provider that accepts service of legal process at P.O. Box 9176, West Hollywood, CA 90069; fax 310-919-1228; and email legal@grindr.com.

7. I make this affidavit in support of an application under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Grindr to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment

1 B, government-authorized persons will review that information to locate the items
2 described in Section II of Attachment B.

3 8. The facts set forth in this Affidavit are based on my own personal
4 investigation; information obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; the review of documents and
6 records related to this investigation; communications with others who have personal
7 knowledge of the events and circumstances described herein; and information gained
8 through my training and experience.

9 9. Because this Affidavit is submitted for the limited purpose of providing
10 sufficient facts necessary to determine whether there is probable cause in support of the
11 application for a search warrant, it does not set forth each and every fact that I or others
12 have learned during the course of this investigation. This affidavit is intended to show only
13 that there is sufficient probable cause for the requested warrant and does not set forth all of
14 my knowledge about this matter.

15 10. Based on my training and experience and the facts set forth in this affidavit,
16 there is probable cause to believe that STANDLEY has committed violations of 18 U.S.C.
17 § 2243 (Sexual Abuse of a Minor). There is also probable cause to believe that evidence,
18 contraband, fruits, and/or instrumentalities of these crimes will be found in the **TARGET**
19 **GRINDR ACCOUNTS**, as described in Attachments B and incorporated herein by
20 reference.

21 SUMMARY OF INVESTIGATION

22 11. On or about November 14, 2022, Seattle Children's Hospital Nurse
23 Practitioner Andrew Given telephoned the Port Angeles Police Department (PAPD) and
24 reported that a 16-year-old boy, MV, had disclosed being sexually assaulted in the woods
25 in the Port Angeles, WA area. MV had turned sixteen on November 5, 2022. On November
26 7, 2022, MV attempted to commit suicide by taking a potentially lethal dose of painkillers.

27 12. PAPD Officer Sean Ryan interviewed Given by telephone. Given reported
28 that MV told him the following: MV's family lived in Port Angeles, WA before they

1 moved in June or July 2022. While living in Port Angeles, MV connected with an adult
2 male using social media apps. MV then physically met with the man in the woods.
3 However, the man “went too far” and sexually assaulted MV.

4 13. Officer Ryan then spoke with both MV’s father and his father’s fiancée. In
5 the aftermath of MV’s suicide attempt they also learned of the sexual assault in the woods.
6 MV told them that he met and coordinated meeting the man who assaulted him on the app,
7 “Grindr.” MV used the word “rape” to describe what the man had done to him.

8 14. PAPD Detective Trevor Dropp was assigned to the case, and he conducted a
9 follow-up telephone interview with MV’s father, who had learned from MV that the place
10 where the assault occurred was likely the woodsy area between the Olympic National Park
11 (ONP) Headquarters and Visitor Center. This area is in the exclusive special maritime and
12 territorial jurisdiction of the United States. On December 28, 2022, Detective Dropp
13 contacted me, and I became the Case Agent for the NPS investigation of the sexual assault
14 of MV in the national park.

15 15. On January 7, 2023, I met with MV and his parents in Lewiston, ID. MV
16 described the area where the assault occurred as along Peabody Creek within ONP, in the
17 wooded area between the park’s headquarters and the main visitor center. MV and his
18 father gave me MV’s iPhone and laptop computer. They consented to use of the iPhone
19 and laptop in the investigation.

20 16. On February 16, 2023, a Child Forensic Interviewer conducted an interview
21 with MV at the Children’s Advocacy Center in the Partners with Families organization in
22 Spokane, WA. MV described that he met an adult man on the app “Grindr” before the end
23 of the 2021-2022 school year. MV was 15 years old at the time. After communicating on
24 Grindr for several days, MV and the man discussed an in-person meeting at the Port
25 Angeles public library. As he waited on a large rock outside the Port Angeles public library
26 MV saw a man in his thirties with disheveled hair get off a public bus and approach him.
27 Although the man looked different than MV expected from a single photo he had seen on
28 social media, MV knew this was the man he had been communicating with on Grindr.

1 17. MV walked and talked with the man. They headed in the direction of ONP
2 from the public library. MV shared details of his life with the man, including that his family
3 was moving away to Idaho over the summer and that his mother had been seriously ill. The
4 man shared that he lives with and cares for his infirm father near Stevens Middle School
5 and Lincoln Park in Port Angeles, WA.

6 18. MV and the man took a trail into the forest and down towards Peabody Creek.
7 Once down the trail out of sight of the parking lot the man undid MV's pants and put his
8 hands and mouth on MV's penis. There were other trail users nearby and the sexual contact
9 ended as an older couple passed by. The man climaxed out of view of MV.

10 19. Over the next few days MV and the man continued to communicate using
11 Grindr. They planned to meet again at the parking lot and adjacent picnic area at the ONP
12 visitor center. MV was apprehensive about the meeting and brought a defensive tool loaned
13 to him by a classmate, M-1. Another friend, M-2, voiced concern about MV meeting the
14 man again and checked in with MV using social media platforms many times while MV
15 was with the man.

16 20. The man and MV communicated by social media apps to connect. MV and
17 the man met near the ONP in Port Angeles, WA. They walked together to the picnic tables
18 by the ONP visitor center. Once there the man took a pocketknife and a machete out of a
19 large, heavy bag. The man put the pocketknife in his pocket and held the machete in his
20 hand as they walked further into the ONP. MV brought towels and had asked the man to
21 bring condoms and lubricant to be safe. However, the man did not bring lubricant and did
22 not use the condoms when he then anally penetrated MV with his penis. This was painful
23 and not what MV had expected to happen. The man did not threaten MV, however MV
24 was scared as the man had the machete and knife. MV worried what would happen if he
25 did not do what the man wanted. The man had an orgasm and MV left immediately after,
26 not waiting for the man to dress and walk with him.

27 //

28 //

21. As he walked home MV spoke with M-2. MV also blocked the man on the social media platforms he had been using to communicate with the man. MV said that he decided to also mentally block out what had happened with the man in the woods.

22. Examination of MV's phone shows that MV had referenced the sexual assaults to a friend, M-3, in text messages on June 4, 2022. MV disclosed to M-3 that he had been raped. Aware that his parents had installed a monitoring app on his phone MV wrote "you know the illegal r word... that then ape x predator." In subsequent texts with M-3 on July 2, 2022, MV writes, "something gross just happened,,, And I don't want the app on my phone to notify my parents... uhh I'll use simple terms.... The m@n who took my uhh... Vinegar Oil... non consensually in the forest, just texted me."

23. Investigation into MV's phone shows that he had removed the Grindr app from his phone at some point after the assaults. In the forensic interview MV stated the man contacted him in July 2022 using social media apps. The man's username on Discord was "for3df3d," and the full user identifier was "forc3df3d#1229." From July 1, 2022, to July 5, 2022, MV and "forc3df3d" wrote messages back and forth. In these exchanges "forc3df3d" does not disagree with MV's account of what happened in the forest. "Forc3df3d" writes that his birthday is approaching on July 24 and wants MV to go on a trip to a local lake with him before MV moves away. MV writes, "I'm not really comfortable going anywhere with you right now... because I was raped but you seemed to forget that." "Forc3df3d" responds, "Well I was trying not to bring that up."

Identification of Briceson Ray Standley

24. During the investigation, I obtained the email address information from Discord associated with the account "forc3df3d#1229." The account is tied to the email account "bricesonrs@gmail.com."

25. From Google, I obtained the information that Briceson Standley is the individual tied to the "Bricesonrs@gmail" account.

26. Briceson Ray STANDLEY, date of birth July 24, 1988, lives at 1305 W 10th Street in Port Angeles, WA. This is close to Stevens Middle School and Lincoln Park just

1 as he described to MV during their walk after meeting at the Port Angeles public library.
 2 STANDLEY lives with his father, Guy Standley, and the Port Angeles Police Department
 3 regularly responds to the residence for reports of domestic disputes between the two.

4 27. A TLO database search shows STANDLEY is associated four other email
 5 accounts. The following five accounts are associated with STANDLEY:

6 bricesonrs@gmail.com

7 bricesonstandley@gmail.com

8 briceson_standley_1988@yahoo.com

9 briceson_standley_1988@hotmail.com

10 brice.standley.88@gmail.com

11 On March 16, 2023, a 90-day preservation request was sent to Grindr for
 12 information associated with the five email accounts associated with STANDLEY.

13 **BACKGROUND ON GRINDR AND** 14 **ELECTRONIC COMMUNICATIONS SERVICES**

15 28. Grindr, LLC operates a location-based mobile interaction and dating
 16 application commonly referred to as “Grindr.” The company, through its application,
 17 provides profile, visual, and chat options. Grindr, LLC was founded in 2009 and is based
 18 at 6725 Sunset Boulevard, Suite 110, West Hollywood, CA, 90028.

19 29. According to its website Grindr is a “global LGBTQ+ social networking
 20 application.” Grindr uses the geolocation features of smart phones to allow users to locate
 21 other nearby users. Users create profiles which give details about the user’s preferences
 22 and self-chosen identifiers and descriptions. Users may select on any user profile from the
 23 local list to begin a “chat” session. Grindr’s chat feature allows users to send messages,
 24 images, GIF’s, pictures, audio messages, and video messages. Grindr also has a video
 25 feature for users who subscribe to a premium service.

26 30. Based on Grindr’s Privacy Policy, effective January 5, 2023, I know the
 27 following about the collection and preservation of data at Grindr:

- 28 a. Grindr collects information from users when they voluntarily provide
 information, such as email, phone number and date of birth when they

1 register for access to the Grindr application and related Internet
 2 services (the “Services”). Additional user information Grindr collects
 3 may include, but is not limited to, username, phone number, email
 4 address, physical location and any content a user uploads to and/or
 shares through the Services.

5 b. When users interact with Grindr by using its Services, Grindr receives
 6 and stores certain information about the user’s device, such as its IP
 7 address, operating system, and browser. Grindr also collects log and
 8 event information related to how and when its Services are used (such
 as the pages, servers, and channels that the user visits) as well as
 hardware and software information.

9 c. Grindr stores messages and attachments that users sent to each other
 10 in text channels, whether on its servers or in direct messages.

11 d. If a user buys any paid services through Grindr, the user may need to
 12 submit a valid payment method and associated billing information,
 13 including a full name and billing address. Grindr’s payment
 14 processors receive and process the user’s payment information.
 15 Depending on the processor, Grindr may also receive and store certain
 16 billing information, including the last four digits of the credit card
 number associated with the transaction.

17 e. Grindr collects information about a user’s use of and activities on the
 18 Services. This includes the profiles of other users each user contacts
 19 through the app, the servers or other communities the user joins, the
 20 user’s role(s) in servers, content moderation decisions made by the
 user, and other related actions.

21 31. I know from my training and experience that the complete contents of an
 22 account may be important to establishing the actual user who has dominion and control of
 23 that account at a given time. Accounts may be registered in false names or screen names
 24 from anywhere in the world with little to no verification by the service provider. They may
 25 also be used by multiple people. Given the ease with which accounts may be created under
 26 aliases, and the rarity with which law enforcement has eyewitness testimony about a
 27 defendant’s use of an account, investigators often must rely on circumstantial evidence to
 28 show that an individual was the actual user of a particular account. Only by piecing together

1 information contained in the contents of an account may an investigator establish who the
2 actual user of an account was. Often those pieces of information will come from before the
3 account was used in the criminal activity. Limiting the scope of the search would, in some
4 instances, prevent the government from identifying the true user of the account and, in
5 other instances, may not provide a defendant with enough information to identify other
6 users of the account. Therefore, the contents of a given account, including the e-mail
7 addresses or account identifiers and messages sent to that account, often provides important
8 evidence regarding the actual user's dominion and control of that account.

9 32. For the purpose of searching for content demonstrating the actual user(s) of
10 the **TARGET GRINDR ACCOUNTS**, I am requesting a warrant requiring Grindr to turn
11 over all information associated with the **TARGET GRINDR ACCOUNTS** with the date
12 restriction included in Attachment B for review by the search team.

13 33. Relatedly, the government must be allowed to determine whether other
14 individuals had access to the **TARGET GRINDR ACCOUNTS**. If the government were
15 constrained to review only a small subsection of an account, that small subsection might
16 give the misleading impression that only a single user had access to the account.

17 34. I also know based on my training and experience that criminals discussing
18 their criminal activity may use slang, short forms (abbreviated words or phrases) or
19 codewords (which require entire strings or series of conversations to determine their true
20 meaning) when discussing their crimes. They can also discuss aspects of the crime without
21 specifically mentioning the crime involved. In the electronic world, it is even possible to
22 use pictures, images and emoticons—images or computer-key configurations used to
23 express a concept or idea, such as a happy face inserted into the content of a message or
24 the use of a colon and parenthesis :) to convey a smile or agreement—to discuss matters.
25 “Keyword searches” would not account for any of these possibilities, so actual review of
26 the contents of an account by law enforcement personnel with information regarding the
27 identified criminal activity, subject to the search procedures set forth in Attachment B, is
28 necessary to find all relevant evidence within the account.

CONCLUSION

35. Based on the forgoing, I respectfully submit there is probable cause to search the **TARGET GRINDR ACCOUNTS** identified in Attachment A for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2243 (Sexual Abuse of a Minor), as further specified in Attachment B. This Court has jurisdiction to issue the requested Warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. §§ 2711, 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A). Specifically, the Court is a “district court of the United States . . . [that] has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). Accordingly, I respectfully request the Court to issue the Warrant.

36. I anticipate executing this Warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the Warrant to require Grindr to disclose to the government copies of the records and other information (including the content of communications) particularly described in Attachment B. Upon receipt of the information described in Attachment B, government-authorized persons will review that information to locate the items described in Attachment B.

37. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this Warrant.

/s/ Susannah R. Lustig
Susannah R. Lustig, Affiant
Special Agent
Investigative Services Branch
National Park Service

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1 The above-named agent provided a sworn statement attesting to the truth of the
2 foregoing affidavit by telephone on the 21st day of April, 2023. This Affidavit was
3 submitted to me by reliable electronic means pursuant to Fed. R. Crim. Proc. 4.1(a).

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5 THERESA L. FRICKE

6 United States Magistrate Judge
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ATTACHMENT A

ACCOUNTS TO BE SEARCHED

Records and information associated with GRINDR ACCOUNTS associated with email accounts:

bricesonrs@gmail.com

bricesonstandley@gmail.com

briceson_standley_1988@yahoo.com

briceson_standley_1988@hotmail.com

brice.standley.88@gmail.com

in connection with the GRINDR application operated by GRINDR LLC, that is stored at premises controlled by GRINDR LLC, a company headquartered at 6725 Sunset Boulevard, Suite 110, Los Angeles, CA 90028-7163; but accepts service of legal process at P.O. Box 9176, West Hollywood, CA 90069; fax 310-919-1228; and email: legal@grindr.com.

ATTACHMENT B

(Items to be Searched for and Seized)

I. Information to be Disclosed by GRINDR LLC.

To the extent that the information described in Attachment A is within the possession, custody, or control of Grindr, including any information that has been deleted but is still available to Grindr, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Grindr is required to disclose the following information to the government for each **TARGET GRINDR ACCOUNTS** listed in Attachment A:

a. All contents of all wire and electronic communications associated with the **TARGET GRINDR ACCOUNTS** for the period May 1, 2022, through the present, including:

- i. All texts, chats, communications, visual depictions including images and video files, or messages of any kind associated with the **TARGET GRINDR ACCOUNTS**, including stored or preserved copies of messages sent to and from the **TARGET GRINDR ACCOUNTS**, deleted messages, and messages maintained in trash or any other folders or tags or labels, as well as all header information associated with each e-mail or message, and any related documents or attachments;
- ii. All records or other information stored by subscriber(s) of the **TARGET GRINDR ACCOUNTS**, including address books, voice and voice-over-IP data, contact and buddy lists, calendar data, pictures, videos, notes, texts, links, user profiles, account settings, access logs, and files;
- iii. All records pertaining to communications between Grindr and any person regarding the **TARGET GRINDR ACCOUNTS**, including contacts with support services and records of actions taken;
- iv. Any and all logs of user activity and user agent string, including: web requests or HTTP requests; any logs containing information such as the Requestor's IP address, identity and user ID, date and timestamp, request URI or URL, HTTP protocol version, referrer, and other user agent string information; login tracker logs; account management logs; and any other information concerning other e-mail or social

media accounts accessed or analytics related to the **TARGET GRINDR ACCOUNTS**;

- v. Any information identifying the device or devices used to access the **TARGET GRINDR ACCOUNTS**, including any Android ID, Advertising ID, unique application number, hardware model, operating system version, unique device identifier, Global Unique Identifier or "GUID," serial number, mobile network information, phone number, device serial number, MAC address, Electronic Serial Number ("ESN"), Mobile Electronic Identity Number ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Number ("MIN"), Subscriber Identity Module ("SIM"), Mobile Subscriber Integrated Services Digital Network Number ("MSISDN"), International Mobile Subscriber Identifier ("IMSI"), International Mobile Equipment Identity ("IMEI"), or Apple advertiser ID or ID for advertisers ("IDEFA"), and any other information regarding the types of devices used to access the **TARGET GRINDR ACCOUNTS** or other device-specific information; and
- vi. Any information showing the location of the user of the **TARGET GRINDR ACCOUNTS**, including while sending or receiving a message using the **TARGET GRINDR ACCOUNTS** or accessing or logged into the **TARGET GRINDR ACCOUNTS**.

Within 14 days of the issuance of this Warrant, Grindr shall deliver the information set forth above via United States mail, courier, or e-mail to the following:

SA Susannah Lustig
Investigative Services Branch
National Park Service
Phone: (360) 809-4566
Email: sanny_lustig@nps.gov

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II. Information to be Seized by the Government.

For each **TARGET GRINDR ACCOUNT** listed in Attachment A, the search team may seize all information described above in Section I that constitutes evidence, contraband, fruits, or instrumentalities of violations of 18 U.S.C. § 2243 (Sexual Abuse of a Minor), those violations involving BRICESON RAY STANDLEY and occurring during May through July, 2022, including:

- a. Records and information relating to sexual assault of a minor;
- b. Records and information relating to contact with MV from GRINDR accounts associated with emails;
 bricesonrs@gmail.com
 bricesonstandley@gmail.com
 briceson_standley_1988@yahoo.com
 briceson_standley_1988@hotmail.com
 brice.standley.88@gmail.com
- c. Records and information relating to STANDLEY's physical location during the commission of the violations described above; and
- d. Records and information that are evidence of agreement between STANDLEY and others to commit the violations described above.

This warrant authorizes a review of electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the NPS may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.